

KEY RECOMMENDATIONS

Stormwater is a significant stressor affecting the health of the Puget Sound ecosystem. Efficiently and effectively managing stormwater to prevent, reduce, and mitigate harm to the ecosystem is a common goal of local, state, and federal governments and agencies, tribes, environmental groups, the business community, and the citizens of Puget Sound. To achieve that goal, a coordinated, integrated approach to quantifying the stormwater problem in Puget Sound and evaluating the effectiveness of stormwater management activities is needed and does not currently exist. The Puget Sound Stormwater Work Group (SWG) was created to recommend such an approach, and we will deliver our recommendations to the Washington State Department of Ecology (Ecology), the Puget Sound Partnership (Partnership) and others at the end of June 2010.

These are our key recommendations for establishing a regional stormwater monitoring and assessment program for Puget Sound:

Strategic Priorities and Overall Framework

1. The initial starting point for this regional stormwater monitoring and assessment program is focused on stormwater-related impacts from urban and urbanizing land uses. Robust, fully-scoped monitoring and assessment programs for other land uses need to be cooperatively developed in the future.
2. The initial starting point for this regional stormwater monitoring and assessment program is focused on stormwater-related impacts to small streams and marine nearshore areas. Robust, fully-scoped monitoring and assessment programs for other water bodies should be cooperatively developed as specific priority questions are identified.
3. The priorities identified for the initial regional stormwater monitoring and assessment program are rooted in an adaptive management framework and will inform important policy decisions.
4. The categories of experimental designs to be included in the initial stormwater monitoring and assessment program include status-and-trends, source identification and diagnostic monitoring, and effectiveness studies. Research activities may be added later as specific priority questions are identified.

Regional Program Implementation Components

5. Ecology and the Partnership should evaluate and decide upon a permanent Stormwater Work Group (SWG) charter, composition, host agency, and long-term funding and support of participation. In doing so they should make modifications as needed to improve the SWG's ability to perform our essential functions.
 - a. Formalize the SWG as an ongoing part of the broader ecosystem monitoring program being created by the Partnership,
 - b. Approve future SWG work plans,
 - c. Continue to use the SWG to prioritize regional stormwater monitoring and assessment activities, and
 - d. Maintain SWG roles of decision making and leadership, coordination, and advising the regional stormwater control strategy.

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6. By the end of June 2010, the SWG will recommend the means to meet and sustain the overall funding needs of this proposed regional stormwater monitoring and assessment program via contributions from local, state, and federal governments, private sources, and others.
7. Support and maintain regional stormwater monitoring and assessment program components through funding contributions and/or in-kind services from all regional entities participating in the regional stormwater monitoring and assessment program.
8. In the next six months, identify the means to create an independent fund dedicated to stormwater-related monitoring and assessment activities that:
 - a. Provides a “pay-in option” for entities covered under municipal stormwater National Pollutant Discharge Elimination System (NPDES) permits that:
 - i. Allows permittees flexibility to meet requirements by either paying into the fund, or conducting monitoring activities themselves,
 - ii. Ensures that permittees’ contributions are spent exclusively on stormwater-related monitoring and assessment activities, and
 - iii. Is managed by an independent entity whose budget is permanently dedicated to monitoring and cannot be re-appropriated to other purposes by any legislative body.
 - b. Allows and encourages all entities in the region to contribute to and participate in coordinated regional monitoring and assessment activities.
 - c. Provides businesses and other NPDES permittees with a future pay-in option.
9. Entities conducting the regional monitoring and assessment activities should partner to share resources and reduce costs.
10. Create and maintain an ongoing inventory of monitoring and assessment activities in Puget Sound, which includes stormwater-related programs.
11. Analyze recent and ongoing stormwater-related studies and findings in Puget Sound, do a gap analysis, and conduct targeted literature reviews to help refine and direct future priorities and experimental designs.
12. Ensure that credible data are collected in a quality manner by ensuring that: data quality objectives are identified; project plans are approved and shared; standard field collection and data reporting protocols are followed; appropriate analytical accuracy, precision, detection, and reporting limits are used at accredited laboratories; and geographic information system (GIS) data follow state guidelines.
 - a. Formulate and support a process to develop and approve standard methods,
 - b. Populate an on-line library with approved methods,
 - c. Maintain a prioritized list of methods that need to be developed, and
 - d. Require NPDES permittees to select from a web-accessible list of approved analytical methods.
13. Create and maintain data management systems for the regional monitoring and assessment program data and findings that:
 - a. Include data repository, storage, and management structures,
 - b. Use appropriate meta-data, data descriptors, and qualifiers,
 - c. Provide easy public access to all data and findings,

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- d. Assign responsibility for providing quality assurance information and for correcting, editing, and updating data to the generators of data or findings, and
 - e. Build upon existing regional data management systems.
14. Require monitoring conducted in all categories of the regional stormwater and assessment program to follow all applicable regional protocols; and require all data and findings to be submitted to a central data management system and readily available to the public.
15. Conduct a collective analysis and synthesis of the data and findings of the regional stormwater monitoring program and other relevant regional and national science activities at least once every five years.
16. Identify and prioritize regional stormwater-related modeling needs.

Status-and-Trends Monitoring

Scientific Framework for Small Stream Status-and-Trends Monitoring

17. Stormwater-related indicators for small streams:
- a. Water quality,
 - b. Benthic macroinvertebrates,
 - c. Physical features,
 - d. Fish diversity and abundance,
 - e. Flow,
 - f. Temperature, and
 - g. Streambed sediment chemistry (metals and toxics).
18. Experimental design for small streams:
- a. Probabilistic sampling of randomly selected sites to assess chemical, physical, and biological status and trends over time.
 - b. Approach is compatible with Ecology's statewide status-and-trend monitoring program (State EMAP) methodology for wadeable streams.
 - c. At the Puget Sound scale: use the existing 30 State EMAP sites located in Puget Sound and/or historical water quality monitoring sites that meet statistical considerations, collect samples for the current State EMAP parameters, and also collect:
 - i. Grab samples for sediment toxic chemicals, and
 - ii. Water quality samples.
 - d. At a minimum of thirteen stations across Puget Sound, also monitor continuous flow and temperature at existing (non-random) stream gauging stations identified in the final study design.
 - e. Within the first year, identify relevant existing data that could further refine the final sampling frequency and design.
19. Identification of small stream sites:
- a. Target second- and third-order "wadeable" streams that are more directly (but not exclusively) affected by stormwater,
 - b. Identify 30 sites at the Puget Sound scale for trend assessment
 - i. Use sites selected for State EMAP, and

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- ii. To the extent possible without compromising the probabilistic design, existing long-term monitoring sites should be included and used.
 - c. Focus on the watershed scale using a probabilistic site-selection approach that can be more densely focused within urban growth areas if appropriate,
 - d. Add sites to total 30 within each of the thirteen local salmon recovery areas in Puget Sound (Water Resource Inventory Areas (WRIAs) and combinations of WRIAs), for a total of 390 sites.
 - e. Island-based watersheds would not be included in this component of the monitoring program due to the limited number of wadeable streams.
20. Small stream monitoring frequency:
- a. At the regional scale: Follow State EMAP protocols, and conduct:
 - i. Annual sediment chemistry sampling at the 30 State EMAP sites,
 - ii. Monthly water quality sampling at the 30 State EMAP sites, and
 - iii. Continuous measurements at the 13 flow and temperature stations.
 - b. At the WRIA scale: Consider, as a target: Ramp-up and conduct two rounds of wadeable stream status-and-trends sampling within a five year cycle from 2012 to 2017 to match the municipal stormwater NPDES permit cycle (begins in 2012), and allow sufficient time for analyses to refine the monitoring program design and inform the following five-year cycle of permits and other efforts.

Implementation Plan for Small Stream Status-and-Trends Monitoring

- 21. Local governments and others will use protocols compatible with Ecology's statewide status-and-trend monitoring (State EMAP) protocols, coordinate with WRIA groups, and partner with others as needed to standardize data collection methods.
- 22. Local governments will help coordinate sampling among the WRIA groups and other entities involved in conducting monitoring of stream benthos, fish, habitat, water quality, and other parameters to avoid duplication of field efforts and achieve cost savings. Sampling is conducted by NPDES permittees, Ecology, and others. Within the first year, identify other opportunities for collaboration.
- 23. Salmon recovery entities, Ecology, the Partnership, and others will coordinate with local governments to fund and conduct two rounds in a five-year period of fish diversity and abundance monitoring and physical feature monitoring.
- 24. Ecology will fund and oversee the State EMAP program within the Puget Sound basin. Local Governments will coordinate with these efforts.
- 25. The SWG will compile information within the next year on current streamflow gauging stations in Puget Sound, analyze current regional streamflow monitoring capacity, and develop a regional network of stream gauges associated to the greatest extent possible with the water quality and habitat monitoring sites.
- 26. Local governments in Puget Sound covered under municipal stormwater NPDES permits will, collectively, fund and conduct the remaining elements of the regional small stream status-and-trends monitoring program (most of the watershed-scale sampling) as part of their overall mandate. The financial contribution and/or level of effort required of each permittee will be based on equitable

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factors, and permittees will be allowed flexibility to either pay into a collective fund or conduct the monitoring themselves.

27. The SWG will coordinate with the Partnership, Puget Sound Salmon Recovery Council, and others to seek additional funding and in-kind contributions for this proposed monitoring and assessment.

Scientific Framework for Nearshore Area Status-and-Trends Monitoring

28. Stormwater-related indicators for nearshore areas:

- a. Fecal coliform,
- b. Bioaccumulation toxicity, and
- c. Sediment chemistry (metals and toxics).

29. Experimental design for nearshore areas:

- a. Probabilistic sampling of randomly selected stratified sites to assess biological and chemical status and trends over time.
- b. Approach is compatible with Washington Department of Health (WDOH) protocols for fecal coliform monitoring.
- c. Approach is compatible with NOAA's national Mussel Watch protocols for bioaccumulation toxicity.
- d. Approach is compatible with PSAMP protocols for sediment chemistry and other nearshore monitoring.

30. Identification of nearshore sites:

- a. Continue bioaccumulation toxicity monitoring at existing ambient Mussel Watch sites.
- b. Randomly select 30 new sites for conducting annual bioaccumulation toxicity monitoring near stormwater outfalls to Puget Sound.
- c. Continue to conduct PSAMP sediment chemistry and other monitoring at nearshore sites.
- d. Conduct sediment chemistry monitoring at 30 randomly selected depositional locations in Puget Sound. Evaluate, statistically and logistically, whether these can be aligned with the Mussel Watch sites.
- e. Focus on areas of the marine nearshore environment that meet Mussel Watch and PSAMP sediment monitoring criteria but are more directly (but not exclusively) affected by stormwater.
- f. Randomly select 50 sites for fecal coliform monitoring at the Puget Sound regional scale, utilizing WDOH, tribal, or other shellfish monitoring data in areas of overlap.

31. Nearshore monitoring frequency:

- a. Monthly fecal coliform sampling,
- b. Annual bioaccumulation toxicity monitoring, and
- c. Annual sediment chemistry monitoring.

Implementation Plan for Nearshore Area Status-and-Trends Monitoring

32. Local governments with stormwater outfalls to Puget Sound will partner with the Mussel Watch program to develop a probabilistic survey approach to select new sites for conducting bioaccumulation toxicity and sediment chemistry sampling.

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33. Local governments with stormwater outfalls to Puget Sound will use protocols compatible with WDOH, Mussel Watch, and PSAMP, and partner with others as needed to standardize data collection methods.
34. Mussel Watch, WDOH, and PSAMP will help coordinate sampling among the entities involved in conducting monitoring of fecal coliform, bioaccumulation toxicity, and sediment chemistry to avoid duplication of field efforts and achieve cost savings. Sampling is conducted by local governments, WDOH, Washington Dept. of Fish and Wildlife, volunteers, Ecology, and others. Within the first year, identify other opportunities for collaboration.
35. Local governments in Puget Sound covered under municipal stormwater NPDES permits will, collectively, conduct the following elements of the regional program as part of their overall mandate. The financial contribution and/or level of effort required of each permittee is based on equitable factors and permittees are allowed flexibility to either pay into a collective fund or conduct the monitoring themselves.
 - a. Monthly fecal coliform monitoring at 50 sites,
 - b. Annual bioaccumulation toxicity (Mussel Watch) monitoring at 30 sites, and
 - c. Annual nearshore sediment chemistry monitoring at 30 sites.
36. Local governments will coordinate with salmon recovery efforts, Puget Sound clean-up efforts, local Departments of Health, the Puget Sound Nearshore Restoration Partnership (PSNRP), and other existing nearshore monitoring efforts.
37. The SWG will coordinate with the Partnership and others to seek additional funding and in-kind resources for this proposed monitoring and assessment.

Source Identification and Diagnostic Monitoring

Scientific Framework for Source Identification and Diagnostic Monitoring

38. A comprehensive regional stormwater-related source identification framework is needed to help inform and prioritize both local and regional source control activities.
39. Source identification is conducted to address long-term receiving-water problems, as part of a broader effort to identify and eliminate pollution sources. Watershed-specific priorities should be set to target initial source identification efforts on the problems of greatest local concern. Regional and local monitoring data and assessment findings need to be reviewed at least once every five years to identify and prioritize problems to address.
40. Key components of source identification include:
 - a. Determine the existing problem sources/impairments to beneficial uses,
 - b. Prioritize sources/impairments,
 - c. Set a target for source reduction,
 - d. Locate sources/impairments,
 - e. Plan the regulatory framework and actions to remove the source(s),
 - f. Implement source removal actions/programs,
 - g. Monitor to provide feedback on status of the source, and
 - h. Sustain or implement monitoring to diagnose emerging sources.

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These activities occur in an iterative process to track improvements in the receiving waters and to identify needs for additional controls. Multiple entities need to cooperate in situations where the impairment is not confined within the boundaries of a single jurisdiction.

Implementation Plan for Source Identification and Diagnostic Monitoring

41. Municipal stormwater NPDES permittees will coordinate with WRIA groups or watershed lead entities to initiate and oversee a process to prioritize problems in each watershed. After prioritization, lead entities will coordinate the development of a plan to address the top priority problem and proceed to implement early management actions and begin appropriate monitoring.
42. In the next six months, Ecology will lead a process, through the SWG, to recommend an approach to source identification monitoring for the municipal stormwater NPDES permits, including appropriate roles and responsibilities.
43. Source identification and diagnostic monitoring, TMDLs, toxic waste clean-ups, and other activities should be coordinated to share resources, reduce costs, and focus on the most important problems.
44. Review source identification and diagnostic monitoring data on a Sound-wide basis at least once every five years to inform and target regional source control initiatives.

Effectiveness Studies

Scientific Framework for Effectiveness Studies

45. Initial studies to assess effectiveness of stormwater best management practices (BMPs) and other urban/urbanizing stormwater management activities will be conducted to address the following three priority areas of investigation:
 - a. Testing the effectiveness of low-impact development (LID) techniques to minimize impacts from future new development and in areas of redevelopment,
 - b. Testing the effectiveness of retrofitting urban areas with various flow management and water quality treatment approaches to decrease impacts from the built environment, and
 - c. Testing the effectiveness of non-structural (i.e., operational, behavior-change, planning) and programmatic approaches used in stormwater management programs, and in particular, of various provisions of the municipal NPDES stormwater permits.

Future studies should (d) evaluate new technologies and (e) fill key knowledge gaps about existing technologies to provide better tools for managing stormwater in the future. In general, studies will be directed to evaluating stormwater management *programs* as well as specific practices and activities. The SWG will reevaluate the focus of regional, prioritized effectiveness studies on a periodic basis.

46. Studies to assess effectiveness of stormwater BMPs will occur at the site scale, basin scale, and regional scale.
47. Studies to assess effectiveness of stormwater BMPs will be designed to answer specific questions with clearly articulated hypotheses for testing.

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48. Studies to assess effectiveness of stormwater BMPs will include quantification of the cost of implementing the stormwater management activities being studied, so that cost-effectiveness can be judged by stormwater managers and policy makers.
49. Stormwater impacts from other land use management approaches and other stormwater permits also need to be addressed.
 - a. An initial effort for agricultural land use will test the effects of agricultural BMPs.
50. In the area of evaluating new technologies, emerging techniques are a recommended focus. Examples include reducing fecal coliform and metals.

Implementation Plan for Effectiveness Studies

51. A literature review needs to be conducted as soon as possible to focus data collection efforts on studies that are needed and to avoid addressing questions that have already been answered and to build on existing work.
52. Requests for proposals will be issued for effectiveness studies, based on the guidance and priorities identified by the SWG. An open and transparent process will be developed to evaluate the submitted proposals and select those for initial implementation.
 - a. The first round of this process needs to be expedited in fall 2010 in order to meet Ecology's needs to identify effectiveness studies that will be included for implementation in the coming municipal stormwater NPDES permit cycle..
53. A transparent public process will identify and prioritize future and more specific topics, questions, and hypotheses for effectiveness studies, applying the following criteria for evaluating and selecting effectiveness studies:
 - a. Meets the criteria for a sufficiently defined working hypothesis.
 - b. Important stressors are addressed,
 - c. Selected studies address a range of the prioritized topics and categories,
 - d. The practices to be evaluated are likely to result in improvements to beneficial uses,
 - e. The study is likely to contribute to our collectively ability to implement more cost-effective stormwater management actions,
 - f. The study is likely to generate results within a two-year time frame, and
 - g. The study is strongly linked to the Puget Sound Action Agenda and results chains.
54. The Technology Assessment Program (TAP-E), which evaluates the effectiveness of new technologies, should continue with funding from new technology proponents and other long-term, reliable funding sources.
55. The Washington State Conservation Commission, Ecology, and other key entities and stakeholders will define a broader effort to assess stormwater impacts from agricultural areas and effectiveness of agricultural BMPs.